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September 21, 2005

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs
AMS, USDA
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Washington, DC 20250-0237

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RE: Docket No. FV03-925-1PR
Federal Register Vol.70, No. 100, Page 30001
Grapes Grown in a Designated Area of Southeastern California and Imported
Table Grapes; Proposed Change in Regulatory Period
COMMENTS IN OPPOSITION TO PROPOSED CHANGE

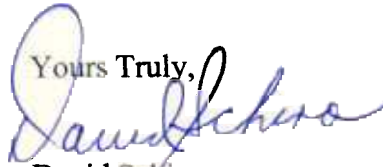
Dear Docket Clerk:

Jac. Vandenberg, Inc. opposes the above referenced change in the dates that Table Grape Marketing Order 925 restrictions will be place on table grapes supplied from Chile. Jac. Vandenberg, Inc has been a direct importer of Chilean Produce for the last 47 years..

Jac. Vandenberg, Inc. concurs with the detailed comments and supporting data submitted by ASOEX, the Chilean Exporters Association. Specifically, Jac. Vandenberg, Inc. urges the agency to reject the proposed change in the regulatory period for the following reasons:

- 1 The change in the beginning effective date of the marketing order from April 20 to April 1 will have a direct negative impact on our ability to supply our customers, the major national and regional supermarkets throughout the United States and Canada.

2. Table grapes sourced by our company from Chile are out of the market before the first significant commercial quantities of the same varieties are available from Coachella and Mexico from mid-May to mid-June.
3. The change in date from April 20 to April 1 will create a definite shortage of table grapes since no country other than Chile produces commercially significant and reliable supplies at this time.
4. The Chilean grapes supplied from April 1 to the earliest commercially significant supplies of grapes from Coachella Valley in California meet marketing specifications from retail chains that are more stringent in some respects than the marketing order requirements.
5. The 20 year-old survey of cold storage practices cited by the proposed rule has no relevance to the way the market works now.
6. The Coachella Valley growers received record prices for their early season grapes in the last two seasons, which demonstrates that Chilean supplies do not have a negative impact on Coachella.

Yours Truly,

David Schiro
President
Jac. Vandenberg, Inc.